



FW: Memo regarding monthly rolling averages.pdf

Peter Keck

to:

Group R5Foia

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From: Peter Keck <peter@compliance-cs.com>

To: Group R5Foia/R5/USEPA/US@EPA,

History: This message has been replied to.

1 Attachment



Memo regarding monthly rolling averages.pdf

Dear EPA:

I would like to know if this memorandum (see attached) has an update that is more current or more appropriate for welding operations. On behalf of my client we are apply for a permit in Michigan with a material limit that is intended to keep us below federal Title V limits 10 tons PTE (for chromium) for welding operations.

The client in Michigan has a potential to emit of 11 TPY HAPS (Chromium) from a welding operation. (8760 hours)

We would like to take a material limit of 5 million pounds welding wire (emission rate of 0.5% PM and max 25% chromium content) which will limit the potential to 3.135 TPY chromium and < 4 TPY total HAPS. The state permit writer in Michigan is wanting us keep a record of the month rolling average material usage and emission calculations to comply with this memo. See highlighted area.

I think it is just busy work since our actual emission are < 0.5 tons. It serves no purpose of making sure we will comply. We would have to complete a year's worth of production in 1.25 months to exceed any rolling average.

Please let me know if there is an exception or an updated memorandum regarding this issue as soon as possible. The states wants an answer from us regarding our acceptance of the recordkeeping requirement by August 31, 2017

Thank you

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